

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

MDL No. 1:13-md-2419-RWZ

This Document Relates to:  
All Cases

**NOTICE OF FILING OF FIRST AMENDED  
JOINT CHAPTER 11 PLAN OF NEW  
ENGLAND COMPOUNDING PHARMACY, INC.**

Paul D. Moore, the Chapter 11 Trustee (the “Trustee”) for the chapter 11 estate of New England Compounding Pharmacy, Inc. (“NECC” or the “Debtor”), and the Official Committee of Unsecured Creditors of NECC (the “Official Committee,” and together with the Trustee, the “Plan Proponents”), hereby give notice of the *First Amended Joint Chapter 11 Plan of New England Compounding Pharmacy, Inc.* (the “Plan”) filed in the United States Bankruptcy Court for the District of Massachusetts (the “Bankruptcy Court”) on February 22, 2015.

For the convenience of parties, a copy of the Plan is attached hereto as Exhibit A, and a blackline comparison copy of the Plan against the originally filed version is attached hereto as Exhibit B. The Plan remains subject to further revision, and has not been approved or reviewed by the Bankruptcy Court. Under applicable law, acceptance or rejection of the Plan cannot be solicited, and is not hereby solicited, by the Plan Proponents, absent prior approval by the Bankruptcy Court.

[Signature Page Follows]

Dated: February 22, 2015  
Boston, Massachusetts

Respectfully submitted,

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Compounding Pharmacy, Inc.*

**Certificate of Service**

I, Michael R. Gottfried, hereby certify that on this day, February 22, 2015, I caused a copy of the foregoing document, which was filed using this Court's ECF system, to be served electronically upon those parties registered to receive ECF service.

/s/ Michael R. Gottfried  
Michael R. Gottfried